

Exhibit 1

Complaint

1 Michael W. Caspino
2 Pro Hac Vice pending
3 PRICE CASPINO
4 30442 Esperanza
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(949) 899-9188
mcaspino@pricecaspino.com

John W. Myers IV (#028422)
BEATTY & MYERS, LLP
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Long Beach, California 90802
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6 Attorneys for Plaintiff
7 BRITTANY NEUHEISEL

8 **SUPERIOR COURT OF THE STATE OF ARIZONA**

9 **COUNTY OF MARICOPA**

10

11 BRITTANY NEUHEISEL,
12 Plaintiff

CASE NO.: **CV2025-004952**

13 vs.
14 MICHAEL J. BIDWILL; ARIZONA
15 CARDINALS FOOTBALL CLUB, LLC, dba
ARIZONA CARDINALS; and DOES 1 through
20, inclusive,

COMPLAINT FOR DAMAGES

16 Defendants.

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18 COMES NOW, Plaintiff Brittany Neuheisel (“Plaintiff” or “Neuheisel”), by and through her
19 counsel undersigned, and for her Complaint against Defendants, does hereby allege as follows:

20 **INTRODUCTION**

21 Brittany Neuheisel is a single mother, grandmother and decorated veteran of the United States
22 Navy. In 2019, she was hired as the personal assistant to Arizona Cardinals owner Michael Bidwill.
23 At the hands of Bidwill, she was continuously tormented for failing to disavow members of her own
24 family and for refusing to participate in illegal conduct. Bidwill unmercifully harassed Plaintiff in
25 an effort to drive her to leave the Cardinals. Bidwill wanted to replace Plaintiff with someone,
26 “Young, Beautiful and Athletic.” Michael Bidwill and the Arizona Cardinals must be held
27 accountable.

28

PARTIES, JURISDICTION AND VENUE

1. Plaintiff Neuheisel is an individual residing in the State of Arizona. From January 2019 until January 28, 2025, Neuheisel worked for Defendant Arizona Cardinals Football Club, LLC dba Arizona Cardinals (“Cardinals”) as Defendant Michael J. Bidwill’s (“Bidwill”) personal assistant.

2. Defendant Bidwill is a resident of the State of Arizona. He is the principal owner, chairman, and president of the Cardinals. He inherited the team from his late father, Bill Bidwill.

3. Defendant Cardinals is a Delaware limited liability company. Their principal place of business is in Tempe, Arizona. The team was established in Chicago in 1898 and joined the National Football League (“NFL”) as a charter member in 1920.

4. Defendants Does 1-10 are individuals with identities that are unknown to Plaintiff. Once Plaintiff ascertains the true identities of Does 1-10, Plaintiff shall amend this Complaint to identify Does 1-10.

5. Defendants Does 11-20 are business entities, form unknown, with identities that are unknown to Plaintiff. Once Plaintiff ascertains the true identities of Does 11-20, Plaintiff shall amend this Complaint to identify Does 11-20.

6. All of the claims and allegations contained herein, arose from actions and/or inactions that occurred, or failed to occur, within the State of Arizona, County of Maricopa.

7. As set forth herein, each Defendant resides or operates within the jurisdiction of this Court. Each Defendant acted or failed to act, while availing themselves of this jurisdiction, in a manner that has caused direct harm to Plaintiff herein.

8. Each Defendant is the agent, servant and/or employee of the other Defendants, and each Defendant acted within the course and scope of his, or her, or its authority as an agent, servant and/or employee of the other Defendants.

9. Defendants and each of them, are individuals, corporations, partnerships, and/or other entities that have engaged in, joined in, and/or conspired with the other wrongdoers in carrying out the tortious and unlawful activities described herein.

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GENERAL ALLEGATIONS

10. Plaintiff Neuheisel is a single mother of four adult children. She also has four grandchildren.

11. Neuheisel served her country in the United States Navy for eight years, achieving the rank of Petty Officer, Second Class.

12. As a non-commissioned officer, Plaintiff Neuheisel supported Special Operations Command Pacific as a Special Security Officer.

13. Plaintiff Neuheisel was highly decorated for her service in the United States Navy, including being awarded the Joint Services Commendation Medal.

14. Between 1999 and 2007, Plaintiff Neuheisel served her country in the United States Navy all while raising four children as a single mother.

15. While in the Navy, Neuheisel graduated from the University of Hawaii with a Bachelor's Degree in Accounting. After being honorably discharged from the Navy, Plaintiff returned to school to earn a Masters Degree in Administration from Northern Arizona University.

16. Thereafter, Plaintiff Neuheisel embarked upon a successful career in the private sector.

17. Neuheisel served as a manager with “Big Four” accounting firm Deloitte for nearly 15 years.

18. Neuheisel also served as a Federal Regulatory Compliance Manager with the City of Phoenix.

19. From 2006 to 2024, Greg Lee served as the Chief Financial Officer for the Cardinals. Before working for the Cardinals Lee had worked for Deloitte, where he became well acquainted with Neuheisel. Lee knew of Neuheisel's outstanding work ethic and competency in the workplace. He repeatedly sought to recruit Neuheisel to join the Cardinals.

20. In 2018, Greg Lee called Neuheisel to recruit her for a position serving as Bidwill's assistant.

21. After interviewing for the job, Plaintiff Neuheisel was offered the position.

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1 22. In 2024, Greg Lee was fired from the Cardinals by Michael Bidwill. Greg Lee had
2 hired a trans-woman for a position within the Cardinals accounting department. This infuriated
3 Michael Bidwill and resulted in Lee being fired.

4 23. In January 2019, Plaintiff Neuheisel began working for the Cardinals. At first,
5 Bidwill's demeanor and conduct was tolerable. Bidwill is a very poor communicator and has a
6 tendency to be socially awkward. Despite this, Plaintiff was able to work with Bidwill in a productive
7 manner. However, over time, Bidwill's personality became petty, abusive, demeaning and
8 intolerable.

9 24. For instance, Bidwill lives in a state of constant conflict with his family members.
10 Despite her repeated objections, Bidwill constantly enrolled Plaintiff in his petty battles with family
11 members, causing her great stress. On April 16, 2021, Bidwill asked Neuheisel to set up a meeting
12 with his niece, Frances Bidwill, with the premise that he was going to discuss her dropping a semester
13 at Arizona State University. When Frances arrived for the meeting, Neuheisel was instructed by
14 Bidwill to remove all of Frances' possessions from her car and to then take the car away from Frances
15 and park it in a secure area.

16 25. The car had been a gift from Bidwill to his niece. The car was taken from Frances and
17 was sold to Carvana. Bidwill instructed Neuheisel to videotape the car being loaded onto a flatbed
18 truck and sold to Carvana. Bidwill then shared the video with his niece in an effort to cause her
19 additional ridicule.

20 26. Bidwill used his dog "Charley" to torment Plaintiff. Because Bidwill is socially
21 awkward and has difficulty communicating, he found comfort in bringing his 59-pound pit bull to the
22 Cardinals' office on a daily basis. Unfortunately, Charley has bitten several Cardinals' employees to
23 the point where some required medical attention from the team's physicians. Most Cardinals'
24 employees were scared to go near Charley.

25 27. In August 2022, Bidwill was at Cardinals training camp. He called Neuheisel and
26 asked her to go to his home to open the doggie door for Charley. Neuheisel did as Bidwill requested
27 and attempted to leave the home as quickly as possible. However, Charley attacked Plaintiff.

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1 28. When Plaintiff got in her vehicle to leave, Bidwill called blaming Plaintiff for allowing
 2 the dog to attack her. Apparently, Bidwill had watched the attack on his home video surveillance
 3 system. Bidwill mocked and laughed at Plaintiff for being attacked by his pit bull.

4 29. Knowing that she was terrified by Charley, Bidwill became empowered with a new
 5 tool to bully Plaintiff. On January 21, 2023, Bidwill asked Plaintiff to set up a conference room for
 6 interviewing General Manager Monti Ossenfort. When Bidwill arrived for the interview, he had
 7 Charley with him. Bidwill ordered Plaintiff to take Charley to the park, knowing that Plaintiff had
 8 been attacked by the dog. Plaintiff objected to having to tend to this dangerous dog. However,
 9 Bidwill insisted that Plaintiff personally care for Charley.

10 30. Plaintiff was in tears and was legitimately scared of being attacked again by the pit
 11 bull. She sought assistance from Cardinals' Chief People Officer Shaun Mayo. She told Mayo that
 12 the dog had bit her and other team employees. She insisted that she felt unsafe with Charley and did
 13 not want to be responsible for this vicious dog. Mayo refused to assist Plaintiff and told her that
 14 Bidwill was my boss, it was his dog, his building. Plaintiff understood she had to do exactly as
 15 Michael Bidwill had ordered, or she would lose her job.

16 ***Bidwill Demands that Plaintiff Disavow Her Children and Grandchildren***

17 31. On April 16, 2024, Plaintiff's 29-year old son suffered a serious medical incident.
 18 With Bidwill out of the office, Plaintiff informed Chief Operating Officer Jeremy Walls that she
 19 needed to leave work to attend to the situation.

20 32. Later that day, Bidwill began sending text messages to Neuheisel while she was
 21 dealing with her family emergency. He repeatedly requested "status updates."

22 33. That evening, Bidwill called Neuheisel and instead of offering support in a time of
 23 need, Bidwill chose to berate Plaintiff. Bidwill repeatedly called Neuheisel an "enabler" that allows
 24 her children to take advantage of her.

25 34. Two of Plaintiff's adult children and her three young grandchildren live with her.

26 35. Bidwill has never been married and has no children. This fact has never stopped
 27 Bidwill from providing unsolicited advice to Plaintiff on how to raise her family. Bidwill repeatedly
 28 told Plaintiff that she needed to "kick out" her daughter and grandchildren from her home.

1 36. The next day Bidwill called Plaintiff into his office. Despite having just suffered a
 2 serious family emergency, Bidwill continued with disparaging Plaintiff over how she raises her
 3 family. Bidwill told Plaintiff that her role as an “enabler” to her family had hurt her psychologically.

4 37. Because of her role in serving as an “enabler,” Bidwill insisted that Plaintiff see team
 5 psychologist, Dr. Marc Strickland. Bidwill stated that through Strickland she can learn how to deal
 6 with her children and grandchildren. Plaintiff told Bidwill that she did not need psychological
 7 assistance. However, Bidwill was relentless and insisted that she meet with Dr. Strickland.

8 38. Plaintiff met with Dr. Strickland. She explained that she was very wary of seeing him
 9 because of his connection to the team. Strickland referred Plaintiff to Dr. Holly Salisbury. However,
 10 Dr. Strickland failed to divulge that Dr. Salisbury is his wife.

11 39. On September 27, 2024, Bidwill returned from NFL committee meetings in New
 12 York. Apparently, there had been a mix up with his ground transportation. Typically, Bidwill’s
 13 flight crew contacts a limousine service to arrange for his ground transportation. However, Bidwill
 14 had just fired his entire flight crew prior to this trip. Therefore, no car had been ordered for Bidwill.

15 40. Bidwill called Plaintiff into his conference room and began to berate her for making
 16 “him look bad in front of other NFL owners”, In a truly warped way of thinking, Bidwill blamed
 17 Neuheisel’s grandchildren for the lack of a limousine ride to the NFL offices. Bidwill stated that
 18 when he called Plaintiff at home prior to his trip to New York to discuss other issues, he forgot to
 19 raise the issue of ground transportation. Bidwill claimed that he forgot to raise this issue with Plaintiff
 20 because he could hear her grandchildren in the background over the phone and was distracted. Thus,
 21 the lack of a limousine for Bidwill was the fault of Neuheisel’s young grandchildren.

22 41. In this meeting, Bidwill told Plaintiff that her relationship with her children and
 23 grandchildren was affecting her work performance. When Plaintiff attempted to tell Bidwill that this
 24 is not the case, he told her, “shut up.” Bidwill then went on a tirade and wanted to know whether her
 25 daughter or grandchildren pay rent at her house. Bidwill demanded to know if Plaintiff pays the credit
 26 cards and living expenses for her daughter and three grandchildren. Plaintiff began to cry hysterically.
 27 Bidwill would not stop demeaning her and inquiring about her personal life.

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1 42. Bidwill then claimed that Cardinals' General counsel, Dave Koeninger, had been an
2 "enabler" with his son who is attending college in Oregon. Bidwill claimed he was able to get
3 Koeninger to stop enabling his son and cut him off financially. Using this example, Bidwill pressed
4 for Plaintiff to disavow her own children and grandchildren.

5 43. Bidwill then changed the subject to Plaintiff's counseling. He chastised her for not
6 attending counseling sessions.

Bidwill Demands that Plaintiff Participate in Illegal Activities and Ridicules Plaintiff's Faith.

9 44. As part of Plaintiff's duties, she was charged with completing complicated federal and
10 international disclosures relating to Bidwill's travel by private airplane.

11 45. On repeated occasions, Bidwill demanded that Plaintiff provide false information on
12 these forms.

13 46. On one occasion in early 2021, Bidwill instructed Plaintiff to ship a firearm via FedEx
14 to an acquaintance. Plaintiff informed Bidwill of the applicable restrictions on shipping a firearm
15 through FedEx. In response, Bidwill told Plaintiff to proceed with the shipment, stating “that’s not
16 what I asked, just ship it.”.

17 47. Bidwill is well aware that Plaintiff is a practicing Catholic who relies heavily upon her
18 faith. Whenever, she objected to Bidwill's practice of providing false information, he would tell
19 Plaintiff, "Do it and then go to confession!"

“Michael Wants Young, Beautiful and Athletic”

1 48. With Plaintiff refusing to disavow her children and grandchildren and to go along with
2 providing false government documents, Bidwill began his efforts to replace her with someone,
3 "Young, Beautiful and Athletic.'

49. Melissa Gaspard (“Gaspard”) serves as the Cardinals’ Vice President of Executive
Operations. Gaspard’s role within the organization is somewhat murky. When Gaspard does work,
she works several days a week out of Michael Bidwill’s home. She has been with the team for 28
years.

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1 50. In 2024, Bidwill began to spend a significant amount of time at the Global Ambassador
2 Hotel in Phoenix. Some of the time, Gaspard would be at his side while at the Global Ambassador
3 Hotel.

4 51. Gaspard told Plaintiff that she was tasked with finding Bidwill a girlfriend. If Bidwill
5 wanted to meet a woman at the Global Ambassador Hotel, it was Gaspard's job to find out who the
6 woman was and report back to Bidwill. Plaintiff was present when Gaspard was being asked on the
7 phone "who the hot blonde in the lobby was." Gaspard informed Plaintiff that Bidwill was asking
8 about Alex Rimer.

9 52. Gaspard hired Alexandria Rimer to serve as the Cardinals' "Director of Events." The
10 scope of Rimer's duties were never discussed. Rimer immediately began working side-by-side with
11 Plaintiff, even taking over some of her duties.

12 53. Neuheisel spoke with Gaspard and asked why Rimer had been hired. Gaspard stated
13 that, "I know what Michael likes to look at; young, beautiful and athletic looking girls." Gaspard
14 stated Rimer would be replacing people like Cari Maas and Tim Beach, who also do not meet those
15 criteria.

16 54. From this point forward, Bidwill verbally abused Plaintiff almost every day. It became
17 clear that Bidwill wanted Plaintiff to quit because she refused to disavow her children and
18 grandchildren and she did not fit into his criteria of being "Young, Beautiful and Athletic." No matter
19 what happened in the office, it was always Neuheisel's fault and Bidwill would yell and scream at
20 her without any reason.

21 55. One such occasion involved Josh Harris, the new owner of the Washington
22 Commanders. Plaintiff had the unenviable job of setting up meetings between Bidwill and other
23 NFL owners. Josh Harris's assistant requested to change the meeting time. Bidwill became furious
24 with Neuheisel and berated her in front of her co-workers. Bidwill proclaimed that going forward, if
25 an NFL owner wanted to change a meeting with Bidwill, they would have to call Bidwill himself.

26 56. On January 13, 2025, the Rams played their playoff game in Phoenix, having been
27 displaced by the Southern California wildfires. Plaintiff typically helped provide hospitality to guests
28 in Bidwill's stadium suite. By this time, most of her duties had been reassigned to Alexandria Rimer.

Plaintiff was now charged with standing near the suite entrance to collect and hang jackets from guests as they entered.

57. Commissioner Goodell entered the suite, and Bidwill introduced him to Alexandria Rimer and other Cardinal employees – except for Neuheisel – purposely bypassing her. Commissioner Goodell took note of Plaintiff being shunned by Bidwill and made a special point of introducing himself to Plaintiff and telling her that he appreciated all of her efforts.

58. After the game, Rams President Kevin Demoff stopped by the suite to thank Michael Bidwill for hosting the Rams in Phoenix. After Demoff left the loft, Bidwill loudly complained that Rams owner Stan Kroenke, who was also in the suite next door, never came to thank him. Another Michael Bidwill verbal tirade ensued.

59. Plaintiff is 54 years old. She served her country, raised four children and is now being replaced by someone else who is “young, beautiful and athletic,” in the eyes of Michael Bidwill.

FIRST CAUSE OF ACTION

(Constructive Discharge – Against All Defendants)

60. Plaintiff hereby incorporates by reference each of the foregoing paragraphs, as though fully set forth herein.

61. Plaintiff's working conditions were objectively unpleasant and difficult such that a reasonable employee would feel compelled to resign.

62. Defendants' outrageous conduct represented a continuous pattern of discriminatory harassment such that a reasonable employee would feel compelled to resign.

63. As a direct proximate result of Plaintiff's constructive discharge, Plaintiff has suffered and will continue to suffer damages within the jurisdiction of this Court.

SECOND CAUSE OF ACTION

(Wrongful Discharge – Against All Defendants)

64. Plaintiff hereby incorporates by reference each of the foregoing paragraphs, as though fully set forth herein.

65. Defendants violated Arizona public policy by wrongfully discharging Plaintiff.

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66. As a direct proximate result of Plaintiff's wrongful discharge, Plaintiff has suffered and will continue to suffer damages within the jurisdiction of this Court.

THIRD CAUSE OF ACTION

(Discrimination – Against All Defendants)

67. Plaintiff hereby incorporates by reference each of the foregoing paragraphs, as though fully set forth herein.

68. Defendants violated Title VII of the *Federal Civil Rights Act* and *Arizona Revised Statutes* §§12-541, 23-1501 and 23-1502 when they discriminated against Plaintiff on the basis of her age, sex and religion.

10 69. Plaintiff has exhausted all administrative remedies and has received her "right to sue."

11 70. As a direct proximate result of Plaintiff's wrongful discharge, Plaintiff has suffered
12 and will continue to suffer damages within the jurisdiction of this Court.

FOURTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress – Against All Defendants)

15 71. Plaintiff hereby incorporates by reference each of the foregoing paragraphs, as though
16 fully set forth herein.

17 72. Defendants exhibited extreme and outrageous behavior towards Plaintiff.

18 73. Defendants' behavior was done intentionally or with reckless disregard for Plaintiff's
19 well-being.

20 74. As a result of Defendants' conduct, Plaintiff suffered severe emotional distress and
21 resulting damages in the form of emotional pain and suffering that continues to this day.

22 75. As a direct proximate result of Defendants's intentional infliction of emotional
23 distress, Plaintiff has suffered and will continue to suffer damages within the jurisdiction of this Court

PRAYER FOR RELIEF

WHEREFORE Plaintiff prays for the following relief:

26 1. For general damages in accord with proof at trial.
27 2. For special damages in accord with proof at trial.
28 3. For costs of suit herein.

4. For attorney's fees.

5. For such other and further relief as this Court deems just and proper, including equitable or injunctive relief.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial for all issues so triable.

DATED: February 6, 2025

BEATTY MYERS

John W. Myers IV (#028422)
Attorneys for Plaintiff Brittany Neuheisel

DATED: February 6, 2025

PRICE CASPINO

By:

Michael W. Caspino (Pro Hac Vice Pending)
Attorneys for Plaintiff Brittany Neuheisel

Exhibit 2

Certificate of Service
Michael Bidwill

Attorney or Party without Attorney
 John W. Myers IV (Arizona Bar #028422)
 BEATTY & MYERS, LLP
 444 West Ocean Blvd. Suite 900
 Long Beach, California 90802
 TELEPHONE No.: (562) 606-1535

Attorney for: Plaintiff Brittany Neuheisel

Ref No. or File No.:
 Neuheisel

Clerk of the Superior Court
 *** Electronically Filed ***
 K. Higuchi-Mason, Deputy
 5/6/2025 9:51:49 AM
 Filing ID 19795361

Insert name of Court, and Judicial District and Branch Court:

In MARICOPA COUNTY SUPERIOR COURT in and for the County of MARICOPA

Petitioner: Brittany Neuheisel

Respondent: Michael J. Bidwill, et al.

CERTIFICATE OF SERVICE

HEARING DATE:

TIME:

DEPT.:

CASE NUMBER:

CV2025-004952

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing is true and correct. At the time of service I was at least 21 years of age and authorized to serve process in this case.

I served copies of the SUMMONS; COMPLAINT; CIVIL COVER SHEET; CERTIFICATE OF COMPULSORY ARBITRATION; PLAINTIFF'S DEMAND FOR JURY TRIAL

a. Party served Michael J. Bidwill

Age: 46-50 Race: Caucasian Sex: Female Eyes: Hazel Height: 5'7 - 6'0 Weight: 161-180 Lbs Hair: Blond

Address where served: 2415 E Camelback Rd Ste 800
 Phoenix, AZ 85016-9291

5. I served the party

a. I personally delivered the documents to the party or person authorized to receive service of process for the party (1) on: 5/5/2025 (2) at: 10:33 AM

BY LEAVING COPIES WITH: LEAH S. FREED - Authorized to Accept on Behalf of Michael J. Bidwill

Age: 46-50 Race: Caucasian Sex: Female Eyes: Hazel Height: 5'7 - 6'0 Weight: 161-180 Lbs Hair: Blond

Person who served papers:



Name: Gerardo Aguilar
 County of Maricopa, MC9069
 901 W. Civic Center Drive, Suite# 190
 Santa Ana, CA 92703
 (714) 558-2400
www.nationwideasap.com

The fee for service was: \$ 140.60

Date: May 5, 2025



(Gerardo Aguilar)

OC216321



CERTIFICATE OF SERVICE

Exhibit 3

Certificate of Service
Arizona Cardinals
Football Club LLC

Attorney for: Plaintiff Brittany Neuheisel

Ref No. or File No.:
Neuheisel

Insert name of Court, and Judicial District and Branch Court:

In MARICOPA COUNTY SUPERIOR COURT in and for the County of MARICOPA

Petitioner: Brittany Neuheisel

Respondent: Michael J. Bidwill, et al.

CERTIFICATE OF SERVICE

HEARING DATE:

TIME:

DEPT.:

CASE NUMBER:

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a. Party served Arizona Cardinals Football Club, DBA Arizona Cardinals

Age: 46-50 Race: Caucasian Sex: Female Eyes: Hazel Height: 5'7 - 6'0 Weight: 161-180 Lbs Hair: Blond

Address where served: 2415 E Camelback Rd Ste 800
Phoenix, AZ 85016-9291

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a. I personally delivered the documents to the party or person authorized to receive service of process for the party (1) on: 5/5/2025 (2) at: 10:33 AM

BY LEAVING COPIES WITH: LEAH S. FREED - Agent for Service

Age: 46-50 Race: Caucasian Sex: Female Eyes: Hazel Height: 5'7 - 6'0 Weight: 161-180 Lbs Hair: Blond

Person who served papers:



Name: Gerardo Aguilar
County of Maricopa, MC9069
901 W. Civic Center Drive, Suite# 190
Santa Ana, CA 92703
(714) 558-2400
www.nationwideasap.com

The fee for service was: \$ 347.30

Date: May 5, 2025



(Gerardo Aguilar)

OC216320



CERTIFICATE OF SERVICE

Exhibit 4

Summons Michael Bidwill

Person Filing: John W. Myers IV

Address (if not protected): 444 W. Ocean Blvd., Ste 900

City, State, Zip Code: Long Beach, CA 90802

Telephone: (562)606-1524

Email Address: jmyers@beattymyers.com

Representing [] Self or [] Attorney for:

Lawyer's Bar Number: 028422, Issuing State: AZ

Clerk of the Superior Court

*** Electronically Filed ***

C. Cruz, Deputy

2/6/2025 3:06:30 PM

Filing ID 19296702

**SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY**

Case Number: CV2025-004952

Brittany Neuheisel

Name of Plaintiff

SUMMONS

AND

Michael J. Bidwill, et al.

Name of Defendant

WARNING: This is an official document from the court that affects your rights. Read this carefully.
If you do not understand it, contact a lawyer for help.

FROM THE STATE OF ARIZONA TO: Michael J. Bidwill

Name of Defendant

1. **A lawsuit has been filed against you.** A copy of the lawsuit and other court papers are served on you with this "Summons".
2. If you do not want a judgment or order taken against you without your input, you must file an "Answer" or a "Response" in writing with the court and pay the filing fee. If you do not file an "Answer" or "Response" the other party may be given the relief requested in his/her Petition or Complaint. To file your "Answer" or "Response" take, or send, the "Answer" or "Response" to Clerk of the Superior Court, or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>. Mail a copy of your "Response" or "Answer" to the other party at the address listed on the top of this Summons. Note: If you do not file electronically you will not have electronic access to the document in this case.

3. If this "Summons" and the other court papers were served on you by a registered process server or the Sheriff, within the State of Arizona, your "Response" or "Answer" must be filed within TWENTY (20) CALENDAR DAYS from the date you were served, not counting the day you were served. If this "Summons" and the other papers were served on you by a registered process server or the Sheriff outside the State of Arizona, your Response must be filed within THIRTY (30) CALENDAR DAYS from the date you were served, not counting the day you were served. Service by a registered process server or the Sheriff is complete when made. Service by Publication is complete thirty (30) days after the date of the first publication.
4. You can get a copy of the court papers filed in this case from the Petitioner at the address at the top of this paper, or from the Clerk of the Superior Court.
5. Requests for reasonable accommodation for persons with disabilities must be made to the office of the judge or commissioner assigned to the case, at least ten (10) judicial days before your scheduled court date.
6. Requests for an interpreter for persons with limited English proficiency must be made to the office of the judge or commissioner assigned to the case at least ten (10) judicial days in advance of your scheduled court date.

SIGNED AND SEALED this Date: *February 06, 2025*

JEFF FINE
Clerk of Superior Court

By: *C. CRUZ*
Deputy Clerk



If you would like legal advice from a lawyer, contact Lawyer Referral Service at 602-257-4434 or <https://marcopabar.org>. Sponsored by the Maricopa County Bar Association.

Exhibit 5

Summons
Arizona Cardinals
Football Club LLC

Person Filing: John W. Myers IV

Address (if not protected): 444 W. Ocean Blvd., Ste 900

City, State, Zip Code: Long Beach, CA 90802

Telephone: (562)606-1524

Email Address: jmyers@beattymyers.com

Representing [] Self or [] Attorney for:

Lawyer's Bar Number: 028422, Issuing State: AZ

Clerk of the Superior Court
 *** Electronically Filed ***
 C. Cruz, Deputy
 2/6/2025 3:06:30 PM
 Filing ID 19296703

**SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY**

Case Number: CV2025-004952

Brittany Neuheisel

Name of Plaintiff

SUMMONS

AND

Michael J. Bidwill, et al.

Name of Defendant

WARNING: This is an official document from the court that affects your rights. Read this carefully.
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Arizona Cardinals Football Club, DBA Arizona
FROM THE STATE OF ARIZONA TO: Cardinals

Name of Defendant

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6. Requests for an interpreter for persons with limited English proficiency must be made to the office of the judge or commissioner assigned to the case at least ten (10) judicial days in advance of your scheduled court date.

SIGNED AND SEALED this Date: *February 06, 2025*

JEFF FINE
Clerk of Superior Court

By: *C. CRUZ*
Deputy Clerk



If you would like legal advice from a lawyer, contact Lawyer Referral Service at 602-257-4434 or <https://maricopabar.org>. Sponsored by the Maricopa County Bar Association.

Exhibit 6

Civil Cover Sheet

**In the Superior Court of the State of Arizona
In and For the County of Maricopa**

Clerk of the Superior Court
*** Electronically Filed ***
C. Cruz, Deputy
2/6/2025 3:06:30 PM
Filing ID 19296700

Plaintiff's Attorneys:

John W. Myers IV - Primary Attorney
Bar Number: 028422, issuing State: AZ
Law Firm: Beatty & Myers, LLP
444 W. Ocean Blvd., Ste 900
Long Beach, CA 90802
Telephone Number: (562)606-1524
Email address: jmyers@beattymyers.com

CV2025-004952

Michael W. Caspino
Bar Number: 00000, issuing State: AZ
Law Firm: PRICE CASPINO
Telephone Number: (949)899-9188

Plaintiff:

Brittany Neuheisel
9018 N. 63rd Lane
Glendale, AZ 85302
Telephone Number: (602)881-2331
Email address: bbneu72@outlook.com

Defendants:

Michael J. Bidwill
Unknown
Unknown, AZ

Arizona Cardinals Football Club, DBA Arizona Cardinals
Unknown
Unknown, AZ

Discovery Tier t3
Amount claimed \$4,000,000.00

Case Category: Tort Non-Motor Vehicle
Case Subcategory: Employment Dispute - Discrimin

Exhibit 7

Certificate of Compulsory Arbitration

Person/Attorney Filing: John W. Myers IV
Mailing Address: 444 W. Ocean Blvd., Ste 900
City, State, Zip Code: Long Beach, CA 90802
Phone Number: (562)606-1524
E-Mail Address: jmyers@beattymyers.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 028422, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

Brittany Neuheisel
Plaintiff(s),

Case No. CV2025-004952

v.
Michael J. Bidwill, et al.
Defendant(s).

**CERTIFICATE OF
COMPULSORY ARBITRATION**

I certify that I am aware of the dollar limits and any other limitations set forth by the Local Rules of Practice for the Maricopa County Superior Court, and I further certify that this case IS NOT subject to compulsory arbitration, as provided by Rules 72 through 77 of the Arizona Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this February 06, 2025

By: John W. Myers IV /s/
Plaintiff/Attorney for Plaintiff

Exhibit 8

Jury Demand

Person Filing: John W. Myers IV

Address (if not protected): 444 West Ocean Blvd. Suite 900

City, State, Zip Code: Long Beach, CA 90802

Telephone: 562-606-1535

Email Address: jmyers@beattymyers.com

Lawyer's Bar Number: 028422

For Clerk's Use Only

Representing Self, without a Lawyer or Attorney for Plaintiff OR Defendant

SUPERIOR COURT OF ARIZONA IN MARICOPA COUNTY

Brittany Neuheisel

Name of Plaintiff

Case Number: CV2025-004952

Title: **PLAINTIFF'S DEMAND for
JURY TRIAL**

Michael J. Bidwill, et al.

Name of Defendant

Plaintiff, Brittany Neuheisel, demands a trial by jury in this case. If this
 (Name of Plaintiff)

case is sent to compulsory arbitration, Plaintiff demands a trial by jury if there is an appeal
 from that compulsory arbitration.

Dated this February 7, 2025

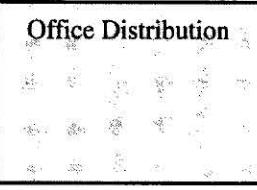
(Date of signature)



(Signature of Plaintiff or Plaintiff's Attorney)

Exhibit 9

Minute Entry



Office Distribution

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

FILED

04/16/2025

by Superior Court Admin
on behalf of Clerk of the
Superior Court

Ct. Admin
Deputy

04/12/2025

COURT ADMINISTRATION

Case Number: CV2025-004952

Brittany Neuheisel

V.

Michael J Bidwill

The Judge assigned to this action is the Honorable Frank W. Moskowitz

NOTICE OF INTENT TO DISMISS FOR LACK OF SERVICE

You are hereby notified that the complaint filed on 02/06/2025 is subject to dismissal pursuant to Rule 4 (i) of the Arizona Rules of Civil Procedure. The deadline for completing service is 05/07/2025. If the time for completing service has not been extended by the court and no defendants have been served by this date, the case will be dismissed without prejudice.

All documents required to be filed with the court should be electronically filed through Arizona Turbo Court at www.azturbocourt.gov.

**Superior Court of Maricopa County - Integrated Court Information System
Endorsee Party Listing**
Case Number: CV2025-004952

Party Name	Attorney Name	
Brittany Neuheisel	John W Myers IV	Bar ID: 028422

Exhibit 10

Superior Court Docket

[« Return to search results](#)**Case Information**

Case Number:	CV2025-004952	Judge:	Moskowitz, Frank
File Date:	2/6/2025	Location:	Downtown
Case Type:	Civil		

Party Information

Party Name	Relationship	Sex	Attorney
Brittany Neuheisel	Plaintiff	Female	John Myers
Michael J Bidwill	Defendant	Male	Pro Per
Arizona Cardinals Football Club L L C	Defendant		Pro Per

Case Documents

Filing Date	Description	Docket Date	Filing Party
5/6/2025	AFS - Affidavit Of Service	5/6/2025	
NOTE:	Certificate of service / Michael J. Bidwill		
5/6/2025	AFS - Affidavit Of Service	5/6/2025	
NOTE:	CERTIFICATE OF SERVICE / Arizona Cardinals Football Club, DBA Arizona Cardinals		
4/16/2025	322 - ME: Notice Of Intent To Dismiss	4/16/2025	
2/7/2025	NJT - Not Demand For Jury Trial	2/10/2025	
NOTE:	PLAINTIFF'S DEMAND for JURY TRIAL		
2/6/2025	COM - Complaint	2/7/2025	
NOTE:	COMPLAINT FOR DAMAGES		
2/6/2025	CSH - Coversheet	2/7/2025	
NOTE:	Civil Cover Sheet		
2/6/2025	CCN - Cert Arbitration - Not Subject	2/7/2025	
NOTE:	Certificate Of Compulsory Arbitration - Is Not Subject To		
2/6/2025	SUM - Summons	2/7/2025	
NOTE:	Summons		
2/6/2025	SUM - Summons	2/7/2025	
NOTE:	Summons		

Case Calendar

There are no calendar events on file

Judgments

Date	(F)or / (A)gainst	Amount	Frequency	Type	Status
No records found.					

Exhibit 11

Notice of Removal from Superior Court

1 David B. Rosenbaum, 009819
2 Theresa Rassas, 023416
3 Brandon T. Delgado, 035924
OSBORN MALEDON, P.A.
2929 North Central Avenue, Suite 2000
Phoenix, Arizona 85012-2793
(602) 640-9000
drosenbaum@omlaw.com
trassas@omlaw.com
bdelgado@omlaw.com

Leah S. Freed, 021332
OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
2415 East Camelback Road, Suite 800
Phoenix, Arizona 85016
(602) 778-3700
leah.freed@ogletree.com

8 *Attorneys for Defendant Michael J. Bidwill
and Arizona Cardinals Football Club LLC*
9

10 SUPERIOR COURT OF ARIZONA

11 IN AND FOR THE COUNTY OF MARICOPA

12 Brittany Neuheisel,

Case No. CV2025-004952

13 Plaintiff,

14 vs.

**NOTICE OF REMOVAL TO
FEDERAL COURT**

16 Michael J. Bidwill, Arizona Cardinals
17 Football Club, LLC, dba Arizona
Cardinals, and DOES 1-20,

18 Defendants.

19 (Assigned to the Honorable
Frank W. Moskowitz)

21 Notice is hereby given that Defendants Michael J. Bidwill and Arizona Cardinals
22 Football Club LLC have removed this action to the United States District Court for the
23 District of Arizona, Phoenix Division, by filing a Notice of Removal in that Court. A copy
24 of the Notice of Removal is attached as Exhibit A. Accordingly, and pursuant to 28 U.S.C.
25 § 1446(d), this Court “shall proceed no further unless and until the case is remanded.”

26 //

27 //

28 //

1 DATED this 3rd day of June 2025.

2 OSBORN MALEDON, P.A.

3 By: /s/ David B. Rosenbaum

4 David B. Rosenbaum

5 Theresa Rassas

6 Brandon T. Delgado

7 2929 North Central Avenue, Suite 2000

Phoenix, Arizona 85012

8 Leah S. Freed

9 OGLETREE, DEAKINS, NASH,

10 SMOAK & STEWART, P.C.

11 2415 East Camelback Road, Suite 800

12 Phoenix, Arizona 85016

13 *Attorneys for Defendants Michael J.*

14 *Bidwill and Arizona Cardinals Football*

15 *Club LLC*

16 ORIGINAL of the forgoing E-filed
17 via AZ TurboCourt with a COPY E-served
18 this 3rd day of June, 2025:

19 Michael W. Caspino
17 (Pro Hac Vice Pending)
18 PRICE CASPINO
30442 Esperanza
19 Rancho Santa Margarita, CA 92688
mcaspino@pricecaspino.com
20 *Attorneys for Plaintiff*

21 John W. Myers IV
22 BEATTY & MYERS, LLP
23 444 West Ocean Blvd. Suite 900
Long Beach, California 90802
jmyers@beattymyers.com
24 *Attorneys for Plaintiff*

25
26 /s/ C. Buxton